

Exhibit 1

Marc Rosenberg

From: Marie Vestal Sharpe
Sent: Friday, October 19, 2018 3:01 PM
To: deniz@bayramoglu-legal.com; dennis.bayramoglu@gmail.com; alecia@bayramoglu-legal.com; chalveruslaw@gmail.com; joechalverus@gmail.com; tracy@apexjuris.com; patentboy@gmail.com; lynette@apexjuris.com; office@apexjuris.com
Cc: Marc Rosenberg; Joel Wright; Kathryn L. Childers; Patty A. Clayton; Greg P. Turner; Christie A. Williams; Susan Munn
Subject: BBC Group NV v. Island Life Restaurant Group 2:18-cv-01011-RSM
Attachments: BBC Group NV v. Island Life - Defs' Oct 2018 ROGS and RFP to Plaintiff.PDF

Counsel,

Attached please find Defendants' October 2018 Interrogatories and Requests for Production to Plaintiff in the above-captioned matter. The hard copies have been mailed.

Thank you,
Marie

Marie Vestal Sharpe | [VCard](#) | [Email](#)

Legal Assistant to: Kathryn L. Childers, Marc Rosenberg and Bradley D. Westphal

Lee Smart, P.S., Inc. | 1800 One Convention Place | 701 Pike St. | Seattle, WA 98101 | www.leesmart.com
Telephone 206.624.7990 | Toll-free 1.877.624.7990 | Fax 206.624.5944

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Exhibit 2

Hon. Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

BBC GROUP NV LLC, a Nevada Limited
Liability Company,

Plaintiff /
Counterclaim Defendant,

vs.

ISLAND LIFE RESTAURANT GROUP
LLC, a Washington Limited Liability
Company; ALEX PRINDLE, a Washington
Resident BRIAN O'CONNOR, a Washington
Resident,

Defendants /
Counterclaim Plaintiffs.

No. 2:18-cv-01011-RSM

DEFENDANTS' OCTOBER 2018
INTERROGATORIES AND REQUESTS
FOR PRODUCTION TO PLAINTIFF

TO: BBC GROUP NV LLC, Plaintiff

AND TO: Joseph Chalverus and Nihat Deniz Bayramoglu, Plaintiff's Attorneys

I. INSTRUCTIONS

Pursuant to Fed.R.Civ.P. 33 and 34, you are requested to supply answers to interrogatories and responses to requests for production on the following pages. As required by Fed.R.Civ.P. 33 and 34, please provide full and complete answers and responses to each and every part in the blank space provided, inserting additional pages where necessary; verify your answers on the form provided after the last interrogatory; and serve a complete set of the

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1 interrogatories, answers and attachments on the undersigned within thirty (30) days of receipt
 2 hereof. These interrogatories are continuing, pursuant to Fed.R.Civ.P. 26(e), and defendant
 3 requests that answers and responses are supplemented in the event new or additional
 4 information becomes known.

5 Privilege. If in responding or failing to respond to a discovery requested herein you
 6 invoke or rely upon any privilege of any kind, please state specifically the nature of the
 7 privilege and the basis on which you invoke, rely or claim it, and identify all documents or
 8 other information, including contracts and communications which you believe to be embraced
 9 by the privilege invoked. Please then produce a privilege log.

10 You are requested to produce for inspection and copying the documents and tangible
 11 things listed herein at the offices of Lee, Smart, P. S., Inc. at 1800 One Convention Place, 701
 12 Pike Street, Seattle, Washington 98101, within 30 days of service of this request.

13 Respectfully submitted this 19 day of October, 2018.

14 LEE SMART, P.S., INC.

15
 16 By: 
 17 Marc Rosenberg, WSBA No. 31034
 18 Kathryn L. Childers, WSBA No. 45231
 19 Of Attorneys for Defendants
 20
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 23
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 25

DEFENDANTS' OCTOBER 2018 INTERROGATORIES
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II. DEFINITION

“You,” “Your”, and “BBC” means BBC GROUP NV, LLC.

III. INTERROGATORIES AND REQUESTS FOR PRODUCTION

INTERROGATORY NO. 1. Identify any and all persons known to you or your attorneys as having knowledge of the relevant facts pertaining to the above-entitled case, including all known contact information for these persons and a brief statement of the information that these persons have or may have. This request is intended to include all potential witnesses known to you or your attorneys.

ANSWER:

REQUEST FOR PRODUCTION NO. 1. Please provide all documents regarding the setup of the “Bok Bok” restaurants including any business plans, meeting minutes, business model, and documents detailing the structure and organization of the restaurants.

INTERROGATORY NO. 2. Please specify your plans for future expansion, including plans for current Bok Bok restaurants and future Bok Bok restaurants.

ANSWER:

REQUEST FOR PRODUCTION NO. 2. Please produce documents related to any expansion plans that you may have, and as specified in Interrogatory 2.

RESPONSE.

1 **REQUEST FOR PRODUCTION NO. 3.** Please identify any loan that BBC has
2 secured to build and operate present and future “Bok Bok” restaurants.

3 **RESPONSE.**

4
5 **REQUEST FOR PRODUCTION NO. 4.** Please produce those portions of any diary,
6 journal, calendar, or similar record kept by BBC or its officers/corporate representatives during
7 the last five (5) years that refer to or relate to the creation of, selection of, and use of the names
8 “bok a bok,” “BOKBOK,” or “BOCBOC Chicken Delight.”

9 **RESPONSE.**

10
11 **INTERROGATORY NO. 3.** Set forth with particularity every element of damages
12 that you allege was incurred by you specifically as a result only of the acts and omissions that
13 you allege were taken by Island Life Restaurant, including special and general damages, if any,
14 setting forth the amount of damage and the analysis used by you to compute the damages.

15 **ANSWER:**

16
17 **REQUEST FOR PRODUCTION NO. 5.** Produce all documents that you believe
18 supports your response to the preceding interrogatory regarding damages.

19 **RESPONSE.**

20
21 **REQUEST FOR PRODUCTION NO. 6.** Please produce documents that reflect
22 confusion between the marks bok a bok, BOKBOK, and/or BOCBOC Chicken Delight.

23 **RESPONSE.**

24
25
DEFENDANTS’ OCTOBER 2018 INTERROGATORIES
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1 **INTERROGATORY NO. 4.** If BBC was previously been involved in other claims or
2 lawsuits as a claimant, plaintiff, defendant, or other type of party, whether civil, criminal,
3 domestic, or any type of proceeding, please provide a complete description of the proceeding or
4 dispute, including such things, where applicable, as the year, jurisdiction, cause number, parties
5 involved, and a basic description of the proceedings, including resolution of the matter
6

7 **ANSWER:**

8 **REQUEST FOR PRODUCTION NO. 7.** Other than documents containing attorney-
9 client privileged or work product information, produce all documents that you possess related
10 to your claimed right to use the name BOK BOK and/or BOCBOC Chicken Delight.
11

12 **RESPONSE.**

13 **INTERROGATORY NO. 5.** If you or any of your attorneys, agents, or contractors
14 have made or taken any written or recorded statements from any person with knowledge of the
15 subject matter of this action, identify as to each such statement the identity, including location,
16 of the person from whom the statement was obtained and the custodian of each statement.
17

18 **ANSWER:**

19 **REQUEST FOR PRODUCTION NO. 8.** Produce all statements identified in the
20 prior Interrogatory.
21

22 **RESPONSE.**

23 **INTERROGATORY NO. 6.** Please identify any communication that BBC or its
24 officers/corporate representatives had, whether written or oral, in which it or its representatives
25

1 discussed creation of, selection of, or use of the names bok a bok, BOKBOK, or BOCBOC
2 Chicken Delight with anyone outside of BBC GROUP including the dates of the
3 communications, persons involved with the communication, and the subject matter of the
4 communication.

5 **ANSWER:**

6
7 **REQUEST FOR PRODUCTION NO. 9.** Please produce documents in your
8 possession that support your answer to the preceding Interrogatory.

9 **RESPONSE.**

10
11 **REQUEST FOR PRODUCTION NO. 10.** Produce all evidence, other than the
12 assignment contract, that reflects that BOKBOK in Nevada received any goodwill from the
13 restaurant BOCBOC Chicken Delight in New York.

14 **RESPONSE.**

15
16 **REQUEST FOR PRODUCTION NO. 11.** Please produce all documents exchanged
17 between BBC and/or its attorneys and Guang-Yang Li and/or his attorneys.

18 **RESPONSE.**

CERTIFICATE

The undersigned attorneys for plaintiff have read the foregoing Answers to Interrogatories and Responses to Requests for Production and certify that they are in compliance with Federal Rules 26 through 37.

DATED this ____ day of _____, 2018, in Seattle, WA.

XXX

By: _____
_____, WSBA No. _____
Of Attorneys for Plaintiff

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_____, being first duly sworn on oath, depose and say:
Please Print Name

I am a corporate representative of plaintiff BBC GROUP NV LLC in the above action, have read the foregoing Answers to Interrogatories and Responses to Requests for Production, know the contents thereof, and believe the same to be true and complete.

On behalf of
BBC GROUP NV, LLC

SUBSCRIBED AND SWORN TO before me this day of November, 2018.

Notary Public in and for the State
of Washington, residing at _____
My commission expires: _____

DECLARATION OF SERVICE

I, declare that on the date provided below, I caused the foregoing document to be served on the following individual(s) in the manner specified:

Mr. Nihat Deniz Bayramoglu
Bayramoglu Law Office, LLC
2520 St. Rose Pkwy, Suite 309
Henderson, NV 89074
Main: (702) 462-5973
E-mail Deniz@Bayramoglu-Legal.com
E-mail dennis.bayramoglu@gmail.com
Alecia alecia@bayramoglu-legal.com

Via Email and US Mail

Mr. Joseph Chalverus
PO Box 25050
Seattle, WA 98165-1950
United States
Main (206) 361-4840
E-mail chalveruslaw@gmail.com
E-mail joechalverus@gmail.com

Mr. Tracy M. Heims
Ms. Ruth L. Wylie
Apex Juris PLLC
12733 Lake City Way NE Ste 101
Seattle, WA 98125-4490
Main (206) 664-0314
Fax (206) 664-0329
E-mail tracy@apexjuris.com
E-mail patentboy@gmail.com
E-mail lynette@apexjuris.com
E-mail office@apexjuris.com

I declare under penalty of perjury under the laws of the United States and the State of Washington that the foregoing is true and correct to the best of my knowledge.

DATED 10/19/18, at Seattle, Washington.


Marie Vestal Sharpe

DEFENDANTS' OCTOBER 2018 INTERROGATORIES
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Exhibit 3

Marc Rosenberg

From: Alecia <alecia@bayramoglu-legal.com>
Sent: Monday, December 03, 2018 5:08 PM
To: Marc Rosenberg; Deniz Bayramoglu; tracy@apexjuris.com; lynette@apexjuris.com; Gokalp@bayramoglu-legal.com
Cc: Kathryn L. Childers; Joel Wright; Susan Munn; Marie Vestal Sharpe; alecia@bayramoglu-legal.com
Subject: RE: BBC v. Island Life
Attachments: Plaintiff's Resp_to_Def's_OctRog_Signed_12-03-2018.pdf; Plaintiff's Resp_to_Def's_OctRFP_Signed12-03-2018.pdf

Dear Counsel,

Please find attached:

1. PLAINTIFF'S RESPONSES TO DEFENDANT'S OCTOBER 2018 INTERROGATORIES.
2. PLAINTIFF'S RESPONSES TO DEFENDANT'S OCTOBER 2018 REQUESTS FOR PRODUCTION.

Kind Regards,

Alecia W. Smith
Intellectual Property Paralegal



Bayramoglu Law Offices
1540 West Warm Springs Rd., Suite 100
Henderson, NV 89014
Phone: 702.462.5973
www.bayramoglu-legal.com

On 12/3/2018 4:58 PM, Deniz Bayramoglu wrote:

Hi Marc,

Thank you for the email and apologies for my late reply, I've been in and out of the office today.

I'll take a look at the draft stipulated protective order over the next day or two.

In the meantime we can agree to the proposal of the service of written responses to ROGS and Objections to RFP's as normally scheduled -- with the documents to follow in two weeks to give us all time to finalize and submit the protective order to the Court.

I'll give Alecia a call now and ask her to serve our ROG responses and RFP Objections, you should receive those shortly.

Best Regards,

Nihat Deniz Bayramoglu
Attorney-at-Law



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On 12/3/18 3:49 PM, Marc Rosenberg wrote:

Greetings:

I just returned from court and both Joel and Kathryn are out of the office today.

While we don't share your belief that "most, if not all" documents are AEO materials, an agreed two-week extension on production of documents would be acceptable under the circumstances. That is not to say that you should not produce documents you may happen to already have in your possession that are not believed to be confidential and which are not a burden to produce; and if there are documents that you do not want to produce on grounds of confidentiality, it would probably be appropriate to provide a log of some kind.

We have been working on a stipulated protective order, and provide a working draft here. See attached.

This is a rough draft, and we reserve the right to make changes until any such document is signed. This is the model agreement in the Western District. Under the local rules, we should leave redline changes in so that the district court knows how we have varied the document. We have added an AEO section from the California stipulation you provided, and some additional proposed revisions, which you will see in the document. Please take a look and let us know if you have any thoughts in regard to this draft.

In the meantime, we will agree that the parties should provide written responses and objections to the discovery requests, and that there is a two-week extension to produce documents, to give us time to finalize the draft protective order.

Please let us know your thoughts in this regard, and whether we should briefly reschedule the document production under these terms..

Please contact us if you have questions.

Marc Rosenberg | Attorney at Law | [VCard](#) | [Email](#) | [Bio](#)

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From: Deniz Bayramoglu [<mailto:Deniz@Bayramoglu-Legal.com>]
Sent: Monday, December 03, 2018 12:23 PM
To: Marc Rosenberg <Mr@leesmart.com>; tracy@apexjuris.com; lynette@apexjuris.com; Gokalp@bayramoglu-legal.com; Alecia@bayramoglu-legal.com
Cc: Kathryn L. Childers <kc@leesmart.com>; Joel Wright <Jw@leesmart.com>; Susan Munn <Sm@leesmart.com>; Marie Vestal Sharpe <mvs@leesmart.com>
Subject: Re: BBC v. Island Life - Several pending matters

Hi Marc and Kathryn,

I hope you had a wonderful Thanksgiving.

I wanted to circle back on some of these issues and see if you had a chance to follow up on the Bok World LLC issue as well as the protective order. Specifically regarding the protective order, I foresee most if not all of the documents requested on both sides for the Requests for Production as either confidential material or AEO material. Given that you haven't had a chance to look at the PO draft, I'm wondering if it is more fruitful for us to mutually delay the RFP responses by one or two weeks or some other amount of time that is reasonable for you and me to get a PO hammered out and on file. To be clear, the responses to Island Life's Interrogatories are ready and will be served later this afternoon or early this evening, The RFP responses are also ready, but I think RFP responses with just objections and a promise to produce confidential documents when the PO issues is an exercise in redundancy for both sides.

Please let me know and we will proceed accordingly.

Thank you and Best Regards,

Nihat Deniz Bayramoglu

Attorney-at-Law



Bayramoglu Law Offices

1540 West Warm Springs Rd., Suite 100

Henderson, NV 89014

Phone: 702.462.5973

www.bayramoglu-legal.com

On 11/20/18 10:08 AM, Marc Rosenberg wrote:

Greetings:

I am just back in the office today, though Katheryn is out.

- I believe we have already dealt with the extension of the discovery response due date for the moment. Thank you for working with us in this regard.
- In regard to the request to add parties, we do not know why you need to add the individuals as parties, but we will talk to our client in regard to whether the client will agree to stipulate to adding Bok World, LLC as a party.
- As to the proposed stipulated protective order (“SPO”), we intend to work with you to come up with a mutually agreeable SPO, and do not object in principle to an AEO clause. However, I have a few urgent deadlines this week, and probably won’t be able to address the specific SPO language until next week.
- In regard to your anticipated cross-motion, we don’t think we need to re-set our current hearing date. Our motion is filed and noted, so you can simply proceed to file your response and cross-motion. The Court will likely consider them together and issue a consolidated order, even if the hearing dates are a couple of weeks apart. In our experience, if the court feels it necessary to amend the hearing date, it will do so *sua sponte*.

In any case, we will follow up on the couple of outstanding issues and get back to you, hopefully next week, in this regard. Have a nice Thanksgiving weekend.

Please contact us if you have information.

Marc Rosenberg | Attorney at Law | [VCard](#) | [Email](#) | [Bio](#)

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From: Deniz Bayramoglu [<mailto:Deniz@Bayramoglu-Legal.com>]
Sent: Thursday, November 15, 2018 5:31 PM
To: Kathryn L. Childers <kc@leesmart.com>
Cc: tracy@apexjuris.com; lynette@apexjuris.com; Joel Wright <Jw@leesmart.com>; Susan Munn <Sm@leesmart.com>; Marc Rosenberg <Mr@leesmart.com>; Gokalp@bayramoglu-legal.com; Alecia <alecia@bayramoglu-legal.com>
Subject: Re: BBC v. Island Life discovery responses

Hello Kathryn,

Thank you for your patience. I have confirmed the 2 or 3 week continuance is fine provided we hammer out some details. So I understand, please confirm the deadlines to respond to the first discovery requests would be December 3rd (for BBC) and December 7th (for Defendants) respectively for a two week extension and December 10th and 14th for a three week extension. Additionally, I would like to come to an agreement with you regarding to the following:

1) In Alex Prindle's Declaration, I note that two of the three restaurants are owned by "Bok World." which the Washington Secretary of State records shows is a limited liability company listing Alex Prindle and Brian O'Connor as members and is therefore a necessary party to the litigation. Would your client and Bok World LLC consent to being added to the present case?

2) Looking at the discovery requests, I foresee production of privileged, propriety, and confidential information. The model protective order for the USDCWW appears to lack an "ATTORNEY'S EYES ONLY" (AEO) clause that I foresee the information being important for attorneys to review but also see the importance in limiting the end client from seeing the document itself. Attached is a model protective order from the Southern District of California that appears substantially the same as the WDW model protective order but includes a different category of AEO confidentiality that I believe would protect our clients' respective interests. Please let me know if you will stipulate to the attached protective order or another order with AEO language or propose an acceptable red-line of the USDCWW PO.

3) We will be filing an opposition to the motion for preliminary injunction. Does your proposed continuance cover the briefing calendar for the pending motion?

4) In any event, we are contemplating filing cross motions, including a motion to strike/suppress certain unsubstantiated allegations in the motion for preliminary injunction. In the interest of judicial efficiency, I take it Judge Martinez would be

inclined toward hearing all motions simultaneously. Would you consent to a hearing date of **December 21, 2018** for all the motions?

Thank you and Best Regards,

Nihat Deniz Bayramoglu
Attorney-at-Law



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Phone: 702.462.5973
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On 11/14/18 4:44 PM, Kathryn L. Childers wrote:
Understood. Thank you for keeping us updated.

Kathryn

Sent from my iPhone

On Nov 14, 2018, at 4:40 PM, Deniz Bayramoglu <Deniz@Bayramoglu-Legal.com<<mailto:Deniz@Bayramoglu-Legal.com>>> wrote:

Ms. Childers,

I am trying to confer with the client and should revert back to you tomorrow afternoon. I imagine that a mutual 2 or 3 week continuance will not be an issue but I want to discuss with the client before committing

Best Regards,

Nihat Deniz Bayramoglu
Attorney-at-Law

<Screen Shot 2018-10-18 at 3.56.51 PM.png>

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